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VIA ECF

The Honorable Nicholas G. Garaufis
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *United States v. Raniere, et al.*, No. 18-cr-204 (NGG)

Dear Judge Garaufis:

On behalf of Defendant Clare Bronfman, we respectfully request an extension to March 25, 2019, to file objections to Judge Scanlon's Report and Recommendation (Dkt. 425) concerning Ms. Bronfman's suppression motion. Judge Scanlon directed that written objections be filed by March 21, 2019, and at Monday's conference, the Court directed that objections be filed by March 22, 2019. We respectfully submit that an additional business day to file objections is appropriate because the Court has directed that several other motions be filed by the current deadline for objections; the Report and Recommendation is 57 pages long; the failure to file adequate objections could result in waiver; and the requested deadline is 3 days shorter than the presumptive deadline set by Fed. R. Crim. P. 59(b)(2). The government does not object, and requests a corresponding extension of its deadline to respond by one business day as well.

Respectfully submitted,

/s/ Alexandra A.E. Shapiro

Alexandra A.E. Shapiro